



ROY ROMER  
Governor

PATRICIA A. NOLAN, MD, MPH  
Executive Director

Hazardous Materials and Waste Management Division  
4210 East 11th Avenue  
Denver, Colorado 80220-3716  
(303) 331-4830 / FAX (303) 331-4401

Telefax Numbers:  
Main Building, Denver  
(303) 322-9076

Parmigan Place, Denver  
(303) 320-1529

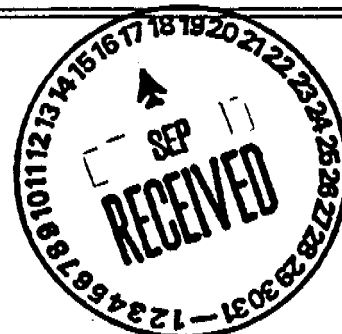
First National Bank Building, Denver  
(303) 355-6559

Grand Junction Office  
(303) 248-7198

Pueblo Office  
(719) 543-8441

September 11, 1992

Mr. Frazer Lockhart  
U.S Department of Energy  
Rocky Flats Plant  
Building 116  
P. O. Box 928  
Golden, Colorado 80402-0928



RE: COMMENTS; DRAFT PHASE I RFI/RI WORKPLAN, ROCKY FLATS PLANT, 700 AREA (Operable Unit No. 8), May, 1992 as supplemented JUNE 22, 1992.

Dear Mr. Lockhart;

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) and the U. S. Environmental Protection Agency (EPA) have reviewed the subject document submitted by DOE and prime contractor, EG&G. The Division's and EPA's comments are attached.

The Division finds that this work plan remains seriously deficient. Although we have been informed that a full review and evaluation of existing data was completed in response to Notice of Violation 92-05-22-01; it is apparent that the proposed Field Sampling Plan (FSP) did not benefit from that effort. Knowledge of the Individual Hazardous Substance Sites (IHSSs) was not consistently demonstrated, and, in part, resulted in a poorly designed FSP.

Additionally, the FSP relied heavily on Table 5 of the IAG Statement of Work which has become less relevant for this operable unit as the IHSS locations, configurations and potential contaminants have been redefined. Greater reliance on the relevant conditions and release mechanisms at each IHSS, rather than Table 5, may have resulted in an acceptable FSP.

Given the extent of the comments on this work plan, the "Final" version will have to undergo a rigorous determination of its adequacy and significant additional comments may be forthcoming from the Division before approval can be considered.

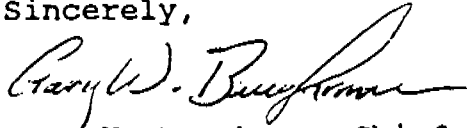
A few basic observations may be drawn from the body of the comments. They are:

- o The lack of IHSS specific subsections in the FSP to describe sampling rationales and strategies is a serious omission. The FSP is more than a guide to field crews; it must demonstrate its ability to determine the nature and extent of contamination.
- o The potential impacts of building footing drains on contaminant migration was raised by DOE's subcontractors in scoping meetings but is not reflected in the FSP.
- o Certain IHSSs appear to have been downsized to conform to tank or building dimensions rather than expanded to investigate releases to the surrounding surface.
- o Certain IHSSs have been relocated without sufficient justification to eliminate the original site from the FSP.
- o Potential contaminants are often described as laundry waste waters or process waters without disclosing the possible chemical or radionuclide constituents.
- o Borings are proposed that, if needed, should be specified in the scheduled Technical Memorandum No. 1. Showing the locations of proposed borings is contrary to the staged approach outlined in the work plan.
- o Surficial sampling that should have been proposed to target releases on the ground surface have often been omitted in favor of borings which may not be necessary.
- o Soil gas surveys are planned for certain IHSSs that are inappropriate to the type of release (e.g. acid spills).
- o The conceptual model flowchart is simplistic and cannot support a thorough baseline risk assessment. Further it is unclear whether the sampling needed to address each pathway is being planned.
- o Table 6.1 is inconsistent, as discussed, and appears to reflect proposed activities that were erroneously carried forward into succeeding IHSSs.

For these and other reasons discussed in the Division's comments, and the attached EPA comments, the work plan must undergo significant revision.

If you have any questions concerning the Division's comments, please call Harlen Ainscough of my staff at 331-4977.

Sincerely,



Gary W. Baughman, Chief  
Facilities Section  
Hazardous Waste Control Program

Attachments

cc: Daniel S. Miller, AGO  
Jackie Berardini, CDH-OE  
Martin Hestmark, EPA  
Bill Fraser, EPA  
Bruce Thatcher, DOE  
Randy Ogg, EG&G  
~~Bruce~~\*Peterman, EG&G